

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MISSOURI PRIMATE FOUNDATION,)
CONNIE BRAUN CASEY, individually,)
ANDREW SAWYER, individually, and)
JANE DOE 2,)
)
Plaintiffs,)
)
v.) **Case No. 4:16-cv-02163**
)
PEOPLE FOR THE ETHICAL)
TREATMENT OF ANIMALS, INC. and)
ANGELA SCOTT a/k/a ANGELA G.)
CAGNASSO, individually,)
)
Defendants.)

DECLARATION OF JARED GOODMAN

Pursuant to 28 U.S.C. § 1746, I, Jared Goodman, declare the following to be true and correct to the best of my knowledge and belief:

1. I am counsel for Counterclaim Plaintiffs People for the Ethical Treatment of Animals, Inc. (“PETA”) and Angela Scott (“Scott”). I make this declaration based upon my personal knowledge and upon information available to me as PETA’s and Scott’s counsel.

2. On July 18, 2017, I sent a letter to Kurtis B. Reeg, then-counsel for Counterclaim Defendants, concerning his clients’ spoliation of evidence. A true and correct copy is attached hereto as **Exhibit A**, filed in support of Counterclaim Plaintiffs’ Motion for Sanctions and Motion for Entry of Default Judgment.

3. On July 20, 2017, I received a response to my July 18 letter from Kurtis B. Reeg, then-counsel for Counterclaim Defendants, concerning his clients’ spoliation of evidence. A true

and correct copy is attached hereto as **Exhibit B**, filed in support of Counterclaim Plaintiffs' Motion for Sanctions and Motion for Entry of Default Judgment.

4. On March 26, 2018, pursuant to subpoena, veterinarian Dr. Doug Pernikoff produced documents relating to his examination of several animals held at MPF. They records indicate that on or around July 27, 2017, Dr. Pernikoff examined two subject chimpanzees prior to their transfer to a Michigan facility. A true and correct copy of an excerpt of these records is attached hereto as **Exhibit C**, filed in support of Counterclaim Plaintiffs' Motion for Sanctions and Motion for Entry of Default Judgment.

5. On May 21 and May 29, Brian R. Shank, counsel for DeYoung Family Zoo, served objections to Counterclaim Plaintiffs' subpoenas requesting the production of documents, inspection of premises, and a deposition with respect to the chimpanzees transferred from Missouri Primate Foundation. True and correct copies of these documents are attached hereto as **Exhibit D**, filed in support of Counterclaim Plaintiffs' Motion for Sanctions.

6. I obtained the following documents, referenced in paragraphs seven through eleven, from the Missouri Secretary of State website by visiting <https://bsd.sos.mo.gov/BusinessEntity/BESearch.aspx?SearchType=0>, entering "Missouri Primate Foundation" into the search field, and following the links to the filings associated with each of the three results.

7. A true and correct copy of a March 8, 1996, registration of "Missouri Primate Foundation" as a fictitious name by Connie Casey (then Braun) and James Casey, No. X00300823, is attached hereto as **Exhibit E**, filed in support of Counterclaim Plaintiffs' Motion for Entry of Default Judgment.

8. A true and correct copy of a September 2, 2009, registration of “Missouri Primate Foundation” as a fictitious name by Connie Casey (then Braun), No. X00997779, is attached hereto as **Exhibit F**, filed in support of Counterclaim Plaintiffs’ Motion for Entry of Default Judgment.

9. A true and correct copy of an October 16, 2009, notice of expiration for fictitious name registration no. X00300823 is attached hereto as **Exhibit G**, filed in support of Counterclaim Plaintiffs’ Motion for Entry of Default Judgment.

10. A true and correct copy of a September 13, 2010, articles of incorporation and certificate of incorporation of “Missouri Primate Foundation” is attached hereto as **Exhibit H**, filed in support of Counterclaim Plaintiffs’ Motion for Entry of Default Judgment.

11. A true and correct copy of a December 16, 2014, notice of expiration for fictitious name registration no. X00997779 is attached hereto as **Exhibit I**, filed in support of Counterclaim Plaintiffs’ Motion for Entry of Default Judgment.

I declare under the penalty of perjury that the foregoing is true and correct.

June 4, 2018

Los Angeles, CA

/s/ Jared Goodman
Jared Goodman